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15 [Proposed] Lead Counsel

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA

18 ROSENBAUM CAPITAL LLC, Individually
19 and on Behalf of All Others Similarly Situated,

20 Plaintiff,

21 v.

22 LUMINENT MORTGAGE CAPITAL, INC.,
23 GAIP P. SENECA, SEWELL TREZEVANT
24 MOORE, JR., and CHRISTOPHER J. ZYDA,

Defendants.

No. 3:07-cv-04096-PJH

CLASS ACTION

NOTICE OF MOTION AND MOTION OF
RONALD LARSON TO CONSOLIDATE
ACTIONS, TO BE APPOINTED LEAD
PLAINTIFF AND FOR APPROVAL OF
LEAD PLAINTIFF'S SELECTION OF LEAD
COUNSEL

DATE: November 21, 2007

TIME: 9:00 a.m.

COURTROOM: 3

JUDGE: Hon. Phyllis J. Hamilton

[Captions Continued on Next Page]

NOTICE OF MOTION AND MOTION OF RONALD LARSON TO CONSOLIDATE ACTIONS, TO BE
APPOINTED LEAD PLAINTIFF AND FOR APPROVAL OF LEAD PLAINTIFF'S SELECTION OF LEAD
COUNSEL

CASE NO. 3:07-cv-04096-PJH

1
2 PEM RESOURCES LP, Individually and On
3 Behalf of All Others Similarly Situated,

4 Plaintiff,

5 v.

6 LUMINENT MORTGAGE CAPITAL, INC.,
7 GAIL P. SENECA, SEWELL TREZEVANT
8 MOORE, JR., and CHRISTOPHER J. ZYDA,

9 Defendants.

Case No. 3:07-cv-04184-PJH

10 HOWARD J. KAPLOWITZ IRA, Individually
11 and On Behalf of All Others Similarly
12 Situated,

13 Plaintiff,

14 v.

15 LUMINENT MORTGAGE CAPITAL, INC.,
16 S. TREZEVANT MOORE, JR. and
17 CHRISTOPHER J. ZYDA,

18 Defendants.

Case No. 3:07-CV-04140-PJH

19 ELLIOT GREENBERG, Individually and On
20 Behalf of All Others Similarly Situated,

21 Plaintiff,

22 v.

23 LUMINENT MORTGAGE CAPITAL, INC.,
24 GAIL P. SENECA, SEWELL TREZEVANT
25 MOORE, JR., and CHRISTOPHER J. ZYDA,

26 Defendants.

Case No. 3:07-cv-04141-PJH

27 ALLEN M. METZGER, On Behalf of Himself
28 and All Others Similarly Situated,

29 Plaintiff,

30 v.

31 LUMINENT MORTGAGE CAPITAL, INC.,
32 GAIL P. SENECA, SEWELL TREZEVANT
33 MOORE, JR., and CHRISTOPHER J. ZYDA,

34 Defendants.

Case No. 3:07-cv-04686-PJH

35 NOTICE OF MOTION AND MOTION OF RONALD LARSON TO CONSOLIDATE ACTIONS, TO BE
36 APPOINTED LEAD PLAINTIFF AND FOR APPROVAL OF LEAD PLAINTIFF'S SELECTION OF LEAD
37 COUNSEL

38 CASE NO. 3:07-cv-04096-PJH

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2 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

3 PLEASE TAKE NOTICE that on November 21, 2007 at 9:00 a.m., or soon thereafter as the
4 matter may be heard, class member Ronald Larson ("Movant"), by his counsel, will move, and
5 hereby does move, this Court for an Order: (i) consolidating for all purposes the above-captioned
6 related actions pursuant to Fed. R. Civ. P. 42(a); (ii) appointing Ronald Larson as lead plaintiff; (iii)
7 approving Ronald Larson's selection of the law firm of Schiffрин, Barroway, Topaz & Kessler, LLP
8 to serve as Lead Counsel; and (iv) granting such other and further relief as the Court may deem just
9 and proper. In support of this motion, Ronald Larson submits herewith a Memorandum of Points
10 and Authorities and Declaration of Alan R. Plutzik. A proposed form of Order is also submitted
11 herewith.

12 Dated: October 9, 2007

Respectfully submitted,

13 SCHIFFRIN BARROWAY
14 TOPAZ & KESSLER, LLP

15 s/Alan R. Plutzik

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